

Exhibit 14

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
06 Civ. 0589 (CGE)

-----x

ANUCHA BROWNE-SANDERS,

Plaintiff,

- against -

MADISON SQUARE GARDEN, L.P., ISIAH LORD
THOMAS, III, and JAMES DOLAN,

Defendants.

-----x

December 13, 2006

10:10 a.m.

VIDEOTAPE DEPOSITION of PETER
OLSEN, taken by the Plaintiff, pursuant to
Notice, held at the offices of Vladeck
Waldman Elias & Engelhard, P.C, 1501
Broadway, New York, New York, before
Debbie Zaromatidis, a Shorthand Reporter
and Notary Public of the State of New
York.

<p>1 OLSEN</p> <p>2 project -- well, there was a project for</p> <p>3 Isiah Thomas, and I know there was at</p> <p>4 least one other one. Oh, well -- well</p> <p>5 there are -- if you -- I don't know if you</p> <p>6 consider it a project or not. So, for</p> <p>7 example, asking me to look into executive</p> <p>8 education for Anucha Browne-Sanders, I</p> <p>9 guess that is a project. I think I am</p> <p>10 missing one, but I -- that's -- that's all</p> <p>11 I mean. It will come to me.</p> <p>12 Q. If you think of it later in the</p> <p>13 deposition, just let me know, and we</p> <p>14 will -- we will add it.</p> <p>15 A. Okay.</p> <p>16 Q. What was the project Mr. Mills</p> <p>17 asked you to do for Mr. Thomas?</p> <p>18 A. He -- he wanted me to -- pardon</p> <p>19 me -- as he termed it help Isiah build his</p> <p>20 organization.</p> <p>21 Q. When did Mr. Mills tell you</p> <p>22 about that project?</p> <p>23 A. I think the first discussion</p> <p>24 about that was a telephone call that Steve</p> <p>25 made to me when I was working at home, and</p>	<p>78</p> <p>1 OLSEN</p> <p>2 conversations about it, so what he said</p> <p>3 exactly on the first I may not get right,</p> <p>4 but he said that he -- we needed to help</p> <p>5 him, you know, know what it takes to be</p> <p>6 successful around here, and I think he</p> <p>7 was -- he may have used but he certainly</p> <p>8 was using that frame of reference that I</p> <p>9 referred to earlier, process, structure,</p> <p>10 feedback. How do we do things here? What</p> <p>11 does it take to be successful here? How</p> <p>12 should he structure his organization?</p> <p>13 Let's see. What -- and again feedback</p> <p>14 meaning what types of reports should he</p> <p>15 get? How should he report to Steve, to</p> <p>16 Jim and Hank, for example. Those kinds of</p> <p>17 things. It was sort of like I took it to</p> <p>18 mean how do we help him understand "The</p> <p>19 Cablevision or MSG way."</p> <p>20 Q. Anything else that you can</p> <p>21 recall during that conversation?</p> <p>22 A. I listed -- it was sort -- it</p> <p>23 was a very quick conversation. He named a</p> <p>24 few different things that I think I</p> <p>25 captured, but I don't remember</p>
<p>79</p> <p>1 OLSEN</p> <p>2 he mentioned that he wanted to help Isiah</p> <p>3 build his organization. I -- did -- what</p> <p>4 was your question?</p> <p>5 Q. Yes. Do you recall when that</p> <p>6 telephone call took place?</p> <p>7 A. Yes, I do remember that. That</p> <p>8 was April 1 I think. I am pretty sure it</p> <p>9 was April 1.</p> <p>10 Q. What did Mr. Mills say during</p> <p>11 that telephone call?</p> <p>12 A. Well, he said a number of</p> <p>13 things. I actually wrote them down, and</p> <p>14 it looks like it that might be the paper</p> <p>15 that I --</p> <p>16 Q. I'll -- I will show you the</p> <p>17 paper, but I would like just your</p> <p>18 recollection now of what -- what he said</p> <p>19 to you.</p> <p>20 A. Okay. Yeah. He mentioned a</p> <p>21 number of things that Isiah</p> <p>22 obviously -- we need to help Isiah build</p> <p>23 his organization. He -- I think it</p> <p>24 is -- again this is a very general answer</p> <p>25 because I -- I know we had a number of</p>	<p>81</p> <p>1 OLSEN</p> <p>2 anything -- that is why I take notes and</p> <p>3 look at notes.</p> <p>4 Q. Do you remember anything that</p> <p>5 you said to Mr. Mills during that</p> <p>6 conversation?</p> <p>7 A. It was really much more of a</p> <p>8 one-way conversation because I -- at least</p> <p>9 I interpreted it as I thought I got an</p> <p>10 understanding what he was talking about</p> <p>11 because it's -- again the parlance of MSG</p> <p>12 and Cablevision is process, structure,</p> <p>13 feedback. So it made sense, but I -- I am</p> <p>14 sure we said -- I don't know if I said it</p> <p>15 or he said it, but I have to believe</p> <p>16 I -- one of us said something about we</p> <p>17 will talk some more but keep it in the</p> <p>18 back of your mind. You know, I'll give</p> <p>19 you some more dates, but think about it</p> <p>20 some more, and we will get together and</p> <p>21 talk some more I think.</p> <p>22 MS. CACACE: Could you mark</p> <p>23 this as Olsen 2.</p> <p>24 A. Okay. Yes.</p> <p>25 (Olsen Exhibit 2 marked for</p>

<p>82</p> <p>1 OLSEN</p> <p>2 identification.)</p> <p>3 (Document handed to witness.)</p> <p>4 Q. Okay. What has been marked as</p> <p>5 Olsen Exhibit 2 is two pages from</p> <p>6 different calendars. The first one has</p> <p>7 been identified as MSG 9213, and the</p> <p>8 second one is MSG 9214.</p> <p>9 Are those the notes you were</p> <p>10 referring to when you had the telephone</p> <p>11 call with Mr. Mills?</p> <p>12 A. Yes.</p> <p>13 Q. Could you read -- well, actually</p> <p>14 starting from the beginning, Deanna Corey,</p> <p>15 is that what it says?</p> <p>16 A. Dianella.</p> <p>17 Q. Who is that?</p> <p>18 A. Steve Mills' administrative</p> <p>19 assistant.</p> <p>20 Q. Did you have a telephone call</p> <p>21 with her that day?</p> <p>22 A. No.</p> <p>23 Q. Do you know what those notes are</p> <p>24 in reference to?</p> <p>25 A. Yes.</p>	<p>84</p> <p>1 OLSEN</p> <p>2 but -- but it was -- it was like a to do</p> <p>3 thing that day.</p> <p>4 Q. What was the thing under Jarret</p> <p>5 Merrell?</p> <p>6 A. It says have Vizio because it</p> <p>7 was -- I think I was as I did often</p> <p>8 helping a senior -- a senior executive in</p> <p>9 this case Steve think through our</p> <p>10 structure, organization charts and</p> <p>11 options, and it takes a little bit of</p> <p>12 thought because if you change one thing it</p> <p>13 means a lot of other things have to</p> <p>14 change, so they -- they may ask for my</p> <p>15 help in terms of helping them as a sort of</p> <p>16 a sounding board, think through org charts</p> <p>17 of the changes. I do org charts in Vizio,</p> <p>18 which is a computer program, and I didn't</p> <p>19 know if they had Vizio, so it is a</p> <p>20 question.</p> <p>21 Q. Okay. And this -- the third</p> <p>22 thing says [REDACTED]</p> <p>23 A. [REDACTED]. I was -- I think</p> <p>24 this is what this was, but I had suggested</p> <p>25 to Steve, you know, that I could be a</p>
<p>83</p> <p>1 OLSEN</p> <p>2 Q. What are they reference to?</p> <p>3 A. This -- Dianella left me either</p> <p>4 an E mail or voicemail. I think it was a</p> <p>5 voicemail after a meeting I had with Steve</p> <p>6 previously, and we were talking -- that</p> <p>7 was at -- I think that is what I meant by</p> <p>8 the skunk works project, like high</p> <p>9 potentials. How do we know who our</p> <p>10 keepers are? How do we better develop our</p> <p>11 talent, so forth? After -- I think it was</p> <p>12 after -- I am pretty sure it was</p> <p>13 afterthought. Steve had -- he said Jarret</p> <p>14 Merrell is the kind of person we are</p> <p>15 talking about. Jarret I think was an</p> <p>16 intern, seems like a very capable young</p> <p>17 person. We should sort of latch on to</p> <p>18 these folks and make sure we develop them</p> <p>19 and develop it -- so, you know, I think he</p> <p>20 said to Dianella ask Pete to go meet with</p> <p>21 Jarret, Jarret Merrell and talk with him</p> <p>22 and see -- he'll know then a little better</p> <p>23 what we are -- what we are talking about.</p> <p>24 So I don't remember if I had already met</p> <p>25 with Jarret at that time or I was going to</p>	<p>85</p> <p>1 OLSEN</p> <p>2 resource on the team side that I had, you</p> <p>3 know -- I have been -- I have done in a</p> <p>4 lot of organizational stuff, a lot of team</p> <p>5 building stuff. Maybe I could</p> <p>6 provide -- I could be the same type of</p> <p>7 resource for the Knicks and Rangers and</p> <p>8 Liberty maybe as I was to senior</p> <p>9 management. Steve had said talk -- you</p> <p>10 should really talk to -- you know, get in</p> <p>11 touch with Lisa Callahan, who was team</p> <p>12 physician for the Knicks and a lot of that</p> <p>13 sort of thing sort of I -- I take, you</p> <p>14 know, was steered through Lisa. So that</p> <p>15 was a follow-up type thing.</p> <p>16 Q. Could -- and could you read your</p> <p>17 notes into the record under Steve Mills?</p> <p>18 A. Um hum. It says, "Process</p> <p>19 document regarding employee development</p> <p>20 draft for discussion purposes Lisa</p> <p>21 Callahan." Lisa, two bullet points.</p> <p>22 Q. What does the first one refer</p> <p>23 to?</p> <p>24 A. Well, I think it probably refers</p> <p>25 to -- I put together a process here is how</p>

<p>86</p> <p>1 OLSEN</p> <p>2 we could do employee development as a</p> <p>3 draft, and I either wanted to work on it</p> <p>4 that day or it wasn't at a meeting I was</p> <p>5 at home that day. So I think it was</p> <p>6 something I wanted to do that day, and</p> <p>7 [REDACTED] was I had either called</p> <p>8 [REDACTED] and she maybe had called me back or</p> <p>9 had not called me back, but it was still</p> <p>10 something that was out there. It wasn't</p> <p>11 finished, so it was like a reminder to</p> <p>12 myself.</p> <p>13 Q. And then what's under that?</p> <p>14 A. Then it says Rusty, and those</p> <p>15 are all also I think to do or just</p> <p>16 thoughts, set up org chart meetings with</p> <p>17 Brian Lafemina.</p> <p>18 Q. Does that have something to do</p> <p>19 with what you discussed with Mr.</p> <p>20 McCormack?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. And could you read down</p> <p>23 the rest of that list?</p> <p>24 A. Yes. It says "don't single out.</p> <p>25 Never worked as exec."</p>	<p>88</p> <p>1 OLSEN</p> <p>2 A. Yes, something like that.</p> <p>3 Q. "Never worked as exec."</p> <p>4 A. Yes.</p> <p>5 Q. That is referring to Mr. Thomas</p> <p>6 has never been an executive before?</p> <p>7 A. Well, that is interpretation or</p> <p>8 my notes based on what he said yes. I</p> <p>9 can't say that Steve said those exact</p> <p>10 words, yes, but I don't think he said</p> <p>11 those exact words.</p> <p>12 Q. Okay. What is the next one</p> <p>13 under that?</p> <p>14 A. I think it says basketball.</p> <p>15 Q. Referring to Mr. Thomas having</p> <p>16 basketball experience?</p> <p>17 A. Yes.</p> <p>18 Q. And the next line?</p> <p>19 A. "What means to be an exec."</p> <p>20 Q. What does that refer to?</p> <p>21 A. That means now he is talking</p> <p>22 about sort of the gist of this service or</p> <p>23 consulting assignment project, help Isiah</p> <p>24 understand what it means to be an</p> <p>25 executive.</p>
<p>87</p> <p>1 OLSEN</p> <p>2 Q. What does that refer to?</p> <p>3 A. That is -- this -- at that point</p> <p>4 this is where I was taking notes on the</p> <p>5 telephone call from Steve.</p> <p>6 Q. Okay. So when it says don't</p> <p>7 single out, what does that refer to?</p> <p>8 A. Well, I -- I think what he was</p> <p>9 saying was he didn't -- this is, you know,</p> <p>10 a very tip -- sort of a typical request.</p> <p>11 They wanted me to have me work with</p> <p>12 somebody, but they don't want them to feel</p> <p>13 like they are being singled out that they</p> <p>14 are the only one who gets this for, you</p> <p>15 know, like -- this kind of treatment or</p> <p>16 whatever I guess or he also could have</p> <p>17 meant don't -- well, that's -- I would say</p> <p>18 that is what he meant.</p> <p>19 Q. And was he referring to Mr.</p> <p>20 Thomas when he said don't single him out?</p> <p>21 A. Yes.</p> <p>22 Q. He didn't want Mr. Thomas being</p> <p>23 singled out for needing special help?</p> <p>24 A. Correct.</p> <p>25 Q. Something like that?</p>	<p>89</p> <p>1 OLSEN</p> <p>2 Q. And what is the --</p> <p>3 A. Here.</p> <p>4 Q. I am sorry. What was the --</p> <p>5 A. Here.</p> <p>6 Q. At The Garden?</p> <p>7 A. Right.</p> <p>8 Q. What is the next line under</p> <p>9 that?</p> <p>10 A. Doesn't -- D -- I think that</p> <p>11 means DK, which means he doesn't know all</p> <p>12 the ground rules or if you will the -- the</p> <p>13 subtleties or whatever of MSG/Cablevision.</p> <p>14 I think that is --</p> <p>15 Q. And then there is something with</p> <p>16 a star?</p> <p>17 A. "Locker room language."</p> <p>18 Q. What does that refer to?</p> <p>19 A. Well, as I think -- as he talked</p> <p>20 about what he -- what he meant, he said,</p> <p>21 you know, for example, he's got to know</p> <p>22 that he can't use locker room language I</p> <p>23 think he said in the offices or around</p> <p>24 here or something like that.</p> <p>25 Q. Did he give you any specifics of</p>

<p>106</p> <p>1 OLSEN</p> <p>2 a card sort, which is a -- it is a</p> <p>3 technique that organizational people like</p> <p>4 myself use. And what we do is go through</p> <p>5 cards and people prioritize what do you</p> <p>6 think is most important and next most</p> <p>7 important at least and so on, so forth.</p> <p>8 So it starts with a broad deck</p> <p>9 of cards, and you have a number of</p> <p>10 different elements, you know, each one</p> <p>11 having its own like element, and then the</p> <p>12 participant sorts through them. So this</p> <p>13 is the most important, and this is -- it</p> <p>14 is nice to have, but it is not critical,</p> <p>15 and this is really not relevant, so forth.</p> <p>16 So it is a way to sort of take this and</p> <p>17 zero it down. So I talked to him about</p> <p>18 that approach, and some things I had to</p> <p>19 build around it I guess or was thinking of</p> <p>20 building around it.</p> <p>21 Q. Okay. When -- you said before</p> <p>22 you -- you came up with this program you</p> <p>23 had some conversations and did some</p> <p>24 reality testing ideas.</p> <p>25 A. Um hum.</p>	<p>108</p> <p>1 OLSEN</p> <p>2 Q. Did -- did Mr. Mills ever tell</p> <p>3 you why he wanted your help to work with</p> <p>4 Mr. Thomas?</p> <p>5 MR. GREEN: Objection. Asked</p> <p>6 and answered. You may answer again, Mr.</p> <p>7 Olsen.</p> <p>8 A. Well, it was these reasons here</p> <p>9 that I mentioned that I think that --</p> <p>10 Q. Did he say whether he tried to</p> <p>11 work with Mr. Thomas previously?</p> <p>12 A. No, he didn't say.</p> <p>13 Q. Did he say anything to the</p> <p>14 effect that he didn't want to hurt his</p> <p>15 relationship with Mr. Thomas?</p> <p>16 A. He didn't say that.</p> <p>17 Q. When -- when you showed</p> <p>18 the -- this card sort to Mr. McCormack,</p> <p>19 what did he think of it?</p> <p>20 A. It --</p> <p>21 MR. GREEN: Objection to form.</p> <p>22 You may answer.</p> <p>23 A. He thought it was a good idea</p> <p>24 and a good technique. I don't know that</p> <p>25 he had ever seen something like that.</p>
<p>107</p> <p>1 OLSEN</p> <p>2 Q. Do you recall that you just said</p> <p>3 that? What -- who did you have</p> <p>4 conversations with and what were the</p> <p>5 reality test -- what was the reality</p> <p>6 testing that you did?</p> <p>7 A. Well, when I say reality</p> <p>8 testing, people that I, you know, knew and</p> <p>9 felt comfortable with whom I could sort of</p> <p>10 show them like a card sort, Rusty I think</p> <p>11 -- I am sure I showed Rusty an early draft</p> <p>12 or the original idea or maybe the cards</p> <p>13 that are the Lominger cards just as a</p> <p>14 process. Here is a technique. I showed</p> <p>15 them to Anucha at lunch on May 11. I</p> <p>16 think it was May 11. Who else did I show</p> <p>17 them to? I -- I may have shown them to</p> <p>18 somebody like Mark Piazza, who I talked to</p> <p>19 fairly often, and who else? Fran Hurley</p> <p>20 who is head of training. I think -- I</p> <p>21 know she saw some iteration of it. It</p> <p>22 went through several iterations as it sort</p> <p>23 of evolved just in terms of feedback and</p> <p>24 what do you think of this. Those people,</p> <p>25 maybe others.</p>	<p>109</p> <p>1 OLSEN</p> <p>2 So I think he -- he was positive for --</p> <p>3 toward it. I don't think it was a long</p> <p>4 discussion, but I know it is -- oh, this</p> <p>5 is interesting.</p> <p>6 Q. When -- what was the context in</p> <p>7 which you showed the cards to</p> <p>8 Ms. Browne-Sanders?</p> <p>9 A. It was at lunch on May 11.</p> <p>10 Q. And what did you tell</p> <p>11 Ms. Browne-Sanders about your -- about the</p> <p>12 project you had -- Mr. Mills had asked you</p> <p>13 to work on with Mr. Thomas?</p> <p>14 A. Well, you're -- I -- are you</p> <p>15 asking me the context of the lunch or</p> <p>16 the --</p> <p>17 Q. What -- what did you tell</p> <p>18 Ms. -- well, did you say to</p> <p>19 Ms. Browne-Sanders before the lunch</p> <p>20 any -- anything about the project Mr.</p> <p>21 Mills asked you to work on with Mr.</p> <p>22 Thomas?</p> <p>23 A. I don't think so. It was only a</p> <p>24 week later, and I don't think I</p> <p>25 saw -- well, the -- the meeting with Steve</p>

<p>1 OLSEN</p> <p>2 was on the seventh, so I don't think I</p> <p>3 said anything to Anucha before that. No.</p> <p>4 Q. Did you ask Ms. Browne-Sanders</p> <p>5 to lunch for the purpose of discussing Mr.</p> <p>6 Mills project with her?</p> <p>7 MR. GREEN: Objection to form.</p> <p>8 You may answer.</p> <p>9 A. Say that question again.</p> <p>10 Q. Did you ask Ms. Browne-Sanders</p> <p>11 to have lunch with you on May 11, so you</p> <p>12 could run by some ideas concerning the</p> <p>13 project Mr. Mills asked you to work on</p> <p>14 with Mr. Thomas?</p> <p>15 A. I don't think I asked her to</p> <p>16 lunch. We had periodically and -- you</p> <p>17 know, for -- for the past few years, we</p> <p>18 had lunch, casual lunch, usually set up in</p> <p>19 passing. We should get lunch. We've got</p> <p>20 to catch up. Yep, let's catch up. This</p> <p>21 was one of those occasions, so it</p> <p>22 wasn't -- the intention of the lunch</p> <p>23 wasn't -- wasn't, you know -- I don't</p> <p>24 remember setting it up. I don't know who</p> <p>25 set it up. I may have or she may have,</p>	<p>1 OLSEN</p> <p>2 you know. It may even cascade and become</p> <p>3 sort of a Knicks program, and I was</p> <p>4 thinking about an approach. Here</p> <p>5 is -- could you look at this with me and</p> <p>6 tell me what you think. This -- something</p> <p>7 like that. I can't say those are the</p> <p>8 exact words, but it was --</p> <p>9 Q. Did you tell Ms. Browne-Sanders</p> <p>10 any of the specifics that Mr. Mills had</p> <p>11 told to you about the reasons he wanted</p> <p>12 you to help Mr. Thomas?</p> <p>13 A. Not that I recall.</p> <p>14 Q. What did Ms. Browne-Sanders say</p> <p>15 to you when you told her you were -- Mr.</p> <p>16 Mills had asked you to do a project with</p> <p>17 Mr. Thomas?</p> <p>18 A. She said quite a bit actually.</p> <p>19 She had a lot to say about -- that</p> <p>20 was -- and these are not the words, but it</p> <p>21 is -- it was sort of well let me tell you</p> <p>22 about Mr. Thomas and the Knicks and all</p> <p>23 that sort of stuff.</p> <p>24 Q. And what did she say to the best</p> <p>25 of your recollection?</p>
<p>1 OLSEN</p> <p>2 but it was -- wasn't set up with -- with</p> <p>3 an intention of sharing the project, but</p> <p>4 the lunch I took as an opportunity to take</p> <p>5 my cards with me to, you know, again ask</p> <p>6 Anucha to be a sounding board and give me</p> <p>7 some feedback on it.</p> <p>8 Q. So what did you say to</p> <p>9 Ms. Browne-Sanders before you showed her</p> <p>10 the card sort about the project Mr. Mills</p> <p>11 had asked you to work on with Mr. Thomas?</p> <p>12 MR. GREEN: Objection to form.</p> <p>13 Asked and answered. You may answer again,</p> <p>14 Mr. Olsen.</p> <p>15 A. I am sorry to ask you. If you</p> <p>16 could say that again, please.</p> <p>17 Q. Sure.</p> <p>18 MS. CACACE: Could you read</p> <p>19 that back.</p> <p>20 (Record read.)</p> <p>21 A. I don't remember the exact</p> <p>22 words, but I'm sure I introduced it</p> <p>23 somehow, and it was something to the</p> <p>24 effect of Steve has asked me to do a</p> <p>25 project with Isiah, maybe with the team,</p>	<p>1 OLSEN</p> <p>2 A. Well, she -- she prefaced that</p> <p>3 by saying very clearly that you have to</p> <p>4 promise you won't say anything about this</p> <p>5 to anybody, which I -- I said I don't know</p> <p>6 if I even said anything because I think</p> <p>7 she leaned forward and, you know, said</p> <p>8 with great emphasis I mean it. You can't</p> <p>9 say anything about this to anybody else,</p> <p>10 and we were at a booth. So I guess I do</p> <p>11 remember the -- the leaning forward part</p> <p>12 and the -- the emphasis on her -- desire</p> <p>13 to emphasize confidentiality is clear to</p> <p>14 this day in my mind.</p> <p>15 Q. Okay. And then what else did</p> <p>16 she say?</p> <p>17 A. Well, then she launched into a,</p> <p>18 for lack of a better word, a diatribe I</p> <p>19 guess about the -- about Mr. Thomas, about</p> <p>20 the Knicks. You are asking my specific</p> <p>21 recollections of that?</p> <p>22 Q. I am --</p> <p>23 A. Words said or --</p> <p>24 Q. To the best of your</p> <p>25 recollection -- recollection what did she</p>

<p>114</p> <p>1 OLSEN</p> <p>2 tell you?</p> <p>3 A. She said that they are a bunch</p> <p>4 of -- I won't have the word right here</p> <p>5 because I took notes after the fact, but</p> <p>6 she said that they are basically a bunch</p> <p>7 of thugs, that they -- if -- if</p> <p>8 something -- you know, it's -- I'm</p> <p>9 thinking -- this probably was my word --</p> <p>10 like almost incestuous. If you're not</p> <p>11 part of this -- she said -- first she</p> <p>12 described the relationship that Mr. Thomas</p> <p>13 had with Stephon Marbury that it was very,</p> <p>14 very close, and she questioned whether or</p> <p>15 not that was for the good of the team.</p> <p>16 You know, that their back</p> <p>17 yards -- they -- they live next to each</p> <p>18 other. Their back yards abut, that they</p> <p>19 talk on the phone until 2 in the morning,</p> <p>20 and that they -- if other players don't go</p> <p>21 along with, you know, the way that they</p> <p>22 see the world, they're excluded I guess</p> <p>23 and that may be my word, but it's like</p> <p>24 either you're in or you're out. The word</p> <p>25 thug was used several times. She -- and</p>	<p>116</p> <p>1 OLSEN</p> <p>2 you're going to sit on the bench, and</p> <p>3 that's in my words right there, but -- she</p> <p>4 mentioned -- she said it would be a</p> <p>5 media -- media field day if the papers</p> <p>6 ever got a hold of it.</p> <p>7 Q. If the papers ever got a hold of</p> <p>8 what?</p> <p>9 A. Well, she -- well, she -- again</p> <p>10 not necessarily in this order, but she</p> <p>11 said -- she mentioned Petra Pope. She</p> <p>12 said Petra Pope I think was -- was Magic</p> <p>13 Johnson's girlfriend, and Isiah knew Petra</p> <p>14 Pope from that relationship, and that</p> <p>15 Isiah had asked Petra Pope to go into the</p> <p>16 referees' locker room before a game and</p> <p>17 alluded to like make them feel comfortable</p> <p>18 or see if there is anything they need or</p> <p>19 something like that. She said that Isiah</p> <p>20 had been seen leaving a hotel with</p> <p>21 this -- [REDACTED] What else?</p> <p>22 I am forgetting things here for sure. I</p> <p>23 guess that's -- I don't remember</p> <p>24 anything -- but it was -- that -- that was</p> <p>25 it.</p>
<p>115</p> <p>1 OLSEN</p> <p>2 then she gave me, you know -- she -- I</p> <p>3 guess she was -- it was a -- she was</p> <p>4 dumping her bucket I guess is the way I</p> <p>5 would say it about -- she was illustrating</p> <p>6 what she meant with some other examples,</p> <p>7 like the Stephon Marbury and Anucha</p> <p>8 talking on the phone until 2 in the</p> <p>9 morning.</p> <p>10 Q. Stephon Marbury and Anucha --</p> <p>11 A. I'm sorry. Isiah Thomas.</p> <p>12 Q. What else did she tell you about</p> <p>13 Mr. Thomas?</p> <p>14 A. She said that it is rule by</p> <p>15 fear. I remember that. She said -- she</p> <p>16 mentioned player -- a couple -- I remember</p> <p>17 her mentioning I think it was Kurt Thomas,</p> <p>18 who was a Knicks player at the time, that</p> <p>19 he was -- you know, he wasn't one who was</p> <p>20 going to go along with this, and that -- I</p> <p>21 think she said that he said I am not an</p> <p>22 ass kisser. I'm not going to play their</p> <p>23 game or something like that, and what she</p> <p>24 was implying was I think if you don't play</p> <p>25 along you don't play the game. You know,</p>	<p>117</p> <p>1 OLSEN</p> <p>2 Q. Did -- did Mrs. Browne-Sanders</p> <p>3 say anything to you about her relationship</p> <p>4 with Mr. Thomas?</p> <p>5 A. Oh. She said that he said</p> <p>6 something about -- that he mentioned the</p> <p>7 word love, and I don't know how he</p> <p>8 characterized it, that I love you. I'm in</p> <p>9 love with you or something to that effect,</p> <p>10 and that they should go off site to plan</p> <p>11 for a day. To which she quickly added and</p> <p>12 with emphasis, I told him no way. And</p> <p>13 when she actually -- now, it is sort of</p> <p>14 coming back to me, but she said</p> <p>15 when -- that he said something about I</p> <p>16 love you or whatever it was that she sort</p> <p>17 of like -- it's -- because of my training</p> <p>18 as a psychologist, it is the way she said</p> <p>19 it I think that -- she said it in a manner</p> <p>20 that was sort of like she sloughed it off,</p> <p>21 like what is -- she may have even said</p> <p>22 what is that supposed to mean. And that I</p> <p>23 think -- I can't remember anything else</p> <p>24 about the relationship between the two of</p> <p>25 them, but those two things were mentioned.</p>

<p>1 OLSEN</p> <p>2 Q. Could you look back at Olsen</p> <p>3 Exhibit 7 please, which is your</p> <p>4 typewritten notes.</p> <p>5 A. Yes.</p> <p>6 Q. At the top of page 9149, that</p> <p>7 first paragraph.</p> <p>8 A. Right.</p> <p>9 Q. The second sentence says, "Went</p> <p>10 to Steve Mills rather than human resources</p> <p>11 on harassment. IT said he was in love</p> <p>12 with her" with the in love in quotes. Is</p> <p>13 that what you wrote?</p> <p>14 A. That's what I wrote.</p> <p>15 Q. That is not vague, is it?</p> <p>16 A. Well --</p> <p>17 MR. GREEN: Objection to form.</p> <p>18 It is argumentative. You may answer, Mr.</p> <p>19 Olsen.</p> <p>20 A. That wasn't -- well, it wasn't</p> <p>21 necessarily meant to convey that it -- it</p> <p>22 was a quote. It was like, you know, how</p> <p>23 sometimes you put in quotes something that</p> <p>24 is -- something that's -- I don't know</p> <p>25 could stand out in some way maybe or a</p>	<p>262</p> <p>1 OLSEN</p> <p>2 Q. I am sorry. Did you tell Mr.</p> <p>3 McCormack that Ms. Browne-Sanders had made</p> <p>4 it clear to you that she had told Mr.</p> <p>5 Mills about Mr. Thomas' behavior?</p> <p>6 MR. GREEN: Same objection.</p> <p>7 You may answer.</p> <p>8 A. Well, it is right here. I mean</p> <p>9 I don't remember talking about it, but</p> <p>10 it's --</p> <p>11 Q. You didn't have a conversation</p> <p>12 with Mr. McCormack about that particular</p> <p>13 matter, whether Ms. Browne-Sanders had</p> <p>14 told Mr. Mills?</p> <p>15 A. Not that I recall.</p> <p>16 Q. Did you tell Mr. McCormack that</p> <p>17 Mr. Mills had asked you to meet with Mr.</p> <p>18 Thomas in part because of locker room</p> <p>19 language that Mr. Thomas had used?</p> <p>20 MR. GREEN: Objection to form.</p> <p>21 Misstates prior testimony. You may</p> <p>22 answer, Mr. Olsen.</p> <p>23 A. Yes, that would be</p> <p>24 uncharacterize -- your unfair</p> <p>25 characterization of what I -- as I sort of</p>
<p>263</p> <p>1 OLSEN</p> <p>2 phrase that could convey different things</p> <p>3 maybe or whatever.</p> <p>4 Q. Did you ever suggest to</p> <p>5 Ms. Browne-Sanders that she should go to</p> <p>6 HR concerning Mr. Thomas' behavior?</p> <p>7 A. I asked her or even suggested</p> <p>8 that she go to Steve. She told me she had</p> <p>9 been to Steve rather than HR. So no, I</p> <p>10 didn't suggest that she go to HR.</p> <p>11 Q. Did you tell Mr. McCormack that</p> <p>12 Ms. Browne-Sanders had made it clear to</p> <p>13 you that she had told Mr. Mills about Mr.</p> <p>14 Thomas' behavior?</p> <p>15 A. Did I make it clear to Mr.</p> <p>16 McCormack?</p> <p>17 Q. Yes.</p> <p>18 MR. GREEN: Objection to form.</p> <p>19 The document speaks for itself, but you</p> <p>20 may answer.</p> <p>21 A. Say again. Sorry.</p> <p>22 Q. You can answer the question.</p> <p>23 A. No, I am -- asking.</p> <p>24 Q. Asking me to repeat.</p> <p>25 A. Yes.</p>	<p>264</p> <p>1 OLSEN</p> <p>2 indicated, I tried to keep Rusty informed</p> <p>3 of what I am doing. I -- I am pretty sure</p> <p>4 I told him that Steve had asked me to do</p> <p>5 this project, help Isiah build his</p> <p>6 organization. I may have mentioned some</p> <p>7 of the things that he mentioned, but it</p> <p>8 certainly wasn't characterized as that</p> <p>9 because of that particular situation.</p> <p>10 Q. Mr. Mills specifically asked you</p> <p>11 to deal with Mr. Thomas' language; isn't</p> <p>12 that correct?</p> <p>13 MR. GREEN: Objection to form.</p> <p>14 Misstates prior testimony. You may</p> <p>15 answer, Mr. Olsen.</p> <p>16 A. Not really.</p> <p>17 Q. Not really but he asked you to</p> <p>18 meet with Mr. Thomas in part because of</p> <p>19 locker room language?</p> <p>20 A. That was the original</p> <p>21 conversation, and he mentioned it as -- as</p> <p>22 one of a number of ways to describe -- he</p> <p>23 didn't -- okay. That is it.</p> <p>24 Q. Did you ever tell Mr. Thomas not</p> <p>25 to use locker room language in the office?</p>

When we try to pick out anything by itself, we find it hitched to everything in the universe.
-John Muir

01
Friday
April 2005

Daily Notes

Still Day 224 (left Week 13)

Diandra Correa - M. James Marshall
② have U.S. 10?

③ Lisa Callahan

Sara Mills

- given die re. employee
- brought re. employee
- for discussion purposes
- Lisa Callahan

Pushy

- sitting in P.O. Club w/ w/ w/

- d. Gough out
- minute withal - see
- P. Ball
- what now? I'll be in

(written)

- P. Ball
- what now? I'll be in
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- what now? I'll be in

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- P. Ball
- what now? I'll be in
- P. Ball
- what now? I'll be in

Appointment Schedule

M	T	W	T	F	S
3	4	5	6	7	8
10	11	12	13	14	15
17	18	19	20	21	22
24	25	26	27	28	29
30					

8

Prioritized Daily Task List

9

10

11

12

1

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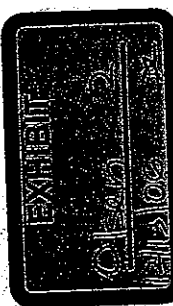
6

7

8

Daily Tracker

Track expenses, e-mail, voice mail, or other information.



April 2005						
SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
3	4	5	6		8 Callie S. Mills re. Thomas	2
10	11 11:00 F. Hurley re. MSG Sports Talent Mgt.	12	13 J. Merrell on statistical analyses of team performance	14 Email re ethics slides to St. Mills re. ethics training building. Email re. Knick's assertiveness training	15 R. McCormack re. research/benchmark ethics training	9
17	18 Email to R. McCormack re. team psych roles	19	20	21	22	16
24	25	26 1:00 C. Forma R. McCormack, HR staff Conf. call re. sales / business ethics	27	28	29 S. Mills (rescheduled)	23
						30

CONFIDENTIAL

MSG 09214

Olsen, Pete

From: Olsen, Pete
Sent: Tuesday, December 27, 2005 3:45 PM
To: McCormack, Rusty
Subject: May 11 meeting notes



Summary of
mments from Anuct

Rusty,
Per your request...
Pete

1



CONFIDENTIAL

MSG 09147

Summary of comments from Anucha Browne Sanders
Meeting on 5-11-05

[On the Knicks] its all about rule by fear. Behind the engaging smile Isiah Thomas is a thug. [Will] turn on you in a second. Doesn't trust anybody. Adversarial nature, doesn't see that has to be different in managing people. Street rules apply, profanity- degrades, undermines people if [he] thinks they're not on his side. A ticking time bomb- [would be] a media field day if anything goes public, doesn't get the importance of ethics and standards in a public company (v. an independent team like Dallas).

Dynamic extends thru the team- close (almost incestuous) with Steph Marbury, [their] backyards about, [IT] talks with SM 'till 2AM- but [this] shouldn't be his role as a Pres / GM- what does this do to the coaches relationship with that player? SM colludes- tension and friction with those who don't go along (P. Hardaway, K. Thomas), SM doesn't communicate with them let alone motivate them- [it is a] gang (posse) mentality, [everybody is either] in or out, nothing in between. KT says "I'm not an ass kisser", SM tries to cut out those he feels don't respect his 'leadership'. SM doesn't really care about the team and others don't trust him- [they know that] anything they say [to SM] will go to IT with a spin on it.

Everybody tries to curry IT's favor. Overall dynamic is that individuals try to take advantage of the dysfunction to further their own agenda, e.g. Frank Murphy will listen to something but then go to IT with that info as his 'confidante' of sorts. Individual agendas [prevail] over team agenda. Everybody is SCARED. FM wants to survive another year or so. He doesn't really have any hidden expertise- [we] could handle it if he left- even the NBA has support on salary cap management (his claim to fame). Nobody is really honest; IT has his posse (M. Aguirre, B. Suhr, and George Glymph. His admin, Raquel Brunette, is IT's cousin [she tells people] "no appointments during *All My Children*).

Enlist B. Suhr? IT may trust him some, same for Steve Mills, but Steve needs to be more direct, BS could maybe give IT direct feedback [there is a] question re. his trustworthiness too- still may be worth the risk.

IT too close to the team. He HOVERS- always at practice facility or in the aisle on game nights. IT says "we need better players" so he is apt to change out the roster leading to further instability.

[REDACTED] was] seen leaving the same hotel with IT several times. The Knicks feared sexual harassment lawsuit if / when she was let go. Players never trusted or talked to her (she used to ask Jamie Matthews how the players were doing).

IT is all ego, narcissistic? 'Little king' quote. All the players have a lot of money, women, etc. and are used to getting whatever they want from an early age.

CONFIDENTIAL

MSG 09148

[Anucha says she has been] very direct with IT, e.g. "nobody tells you the truth". Went to Steve Mills rather than Human Resources on harassment (IT said [he was] "in love" with her), and wanted to go off site for a day to plan. Anucha said "no way".

The team is seriously fractured, low confidence, doesn't care, all [of them] got their millions.

Seems this should infuriate IT. If not, why? Or, it does, and he takes it out in unproductive ways?

Anucha [would] like to get with Steve and me but NOT say we talked. Proposes going to Steve [and say] what are you going to do about this? Maybe to [REDACTED] too at some point

IT's style similar to Jim Dolan's [in that he gets] no real honest feedback, [has] tirades, threats.

Need some form of role negotiation [?] Steve is nice, Herb Williams is too nice, as was Cheney and Wilkens, and players need an ass kicker.

Does IT side with players when [there is] player-management conflict?

Steve is conflict / confrontation avoidant. Rehearse and video coach him too?

Can draw on IT's ego and desire to win championship, i.e. redeem self from questions about the Raptors, CBA, Pacers

IT is calculated and cunning. Knows exactly what he's doing.

IT [said] to Petra Pope Belton (pre-game) "make sure the refs are comfortable" What's that mean? Nobody supposed to be in the room with the refs pre-game. What would the media say if heard the Knicks were trying to influence the refs? PPB was Magic Johnson's girlfriend when IT was dating his current wife so they know each other well.

Role conflict between Anucha and IT. IT doesn't believe in much player-fan interaction to increase sales. Believes players should concentrate on BBall only.

IT an instigator with an explosive temper. With Detroit, Laimbeer was the enforcer, [would] clean up what IT started.

Doesn't see the cultural cues (corporate culture) so he doesn't differentiate street / ghetto norms from corporate ones? Anucha suggests sexual harassment training. Is training the answer? Culture is 'blame frame' and no responsibility.

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MSG 09149

Exhibit 15



News Release

New York Knickerbockers
Public Relations
Two Pennsylvania Plaza
New York, NY 10121-0091
Tel (212) 465-6471
Fax (212) 465-6498

FOR IMMEDIATE RELEASE

CONTACT: Joe Favorito
(212) 465-6442

ANUCHA BROWNE SANDERS PROMOTED TO SENIOR VICE PRESIDENT, MARKETING & BUSINESS OPERATIONS

NEW YORK, May 13, 2002 – The New York Knickerbockers today announced the promotion of Anucha Browne Sanders to the newly-created position of Senior Vice President, Marketing and Business Operations. Browne Sanders had held the position of Vice President of Marketing since joining the team on Nov. 20, 2000 and will assume her new role immediately.

"Anucha has done an outstanding job in a very short time with the Knicks and is one of the rising stars in the field," said Madison Square Garden President, Sports Team Operations Steve Mills. "This new position will allow her to more effectively set the strategy in leveraging the Knicks' brand."

"It is both an honor and a pleasure to accept this promotion," Browne Sanders said. "The potential of developing the Knicks brand is just beginning to be realized, and I am looking forward to working with our entire team to have us realize that potential."

In her new role, the Brooklyn, N.Y. native will be responsible for the day-to-day management of the business side of the Knicks front office and serve as the team's chief marketing officer. Her responsibilities will be overseeing all of the club's business agendas, including: partnerships, fan development, field marketing, event presentation, community relations, special events and new media. She will work closely with MSG's other sports properties - the New York Rangers and New York Liberty - in finding new and innovative ways to integrate the three very distinct and highly successful brands, and be the primary liaison between the team and the NBA.

Prior to joining the Knicks, Browne Sanders spent 11 years with IBM Corporation, serving in a number of roles, most recently as a Program Manager in IBM's Worldwide Sports Office. In that capacity, she was responsible for a number of IBM's marketing efforts during the Olympic Games (Atlanta 1996, Nagano 1998 and Sydney 2000), including corporate sponsorship efforts that allowed IBM to leverage their investment as a Worldwide Olympic sponsor.

The Northwestern University graduate is also no stranger to success on the hardwood. She was a three-time All Big Ten selection and two-time Big Ten Player of the Year for the Wildcats, finishing her career as the all-time leading scorer in Big Ten women's basketball history, as well as the school's all-time leader in points (2,307) and rebounds (951). Anucha was a two-time Wade Trophy nominee, 1985 Kodak All-American and in her senior season of 1984-85, and led the nation in scoring (a school record 31.5 ppg). She was also selected to play on the U.S. National Team that toured Europe and Asia following her graduation.

Browne Sanders, 38, holds a Bachelors of Science in Communications from Northwestern, and a Masters degree in Marketing communications from Florida State University. Anucha resides with her husband Roy and their three children in New Jersey.

The NBA's New York Knickerbockers basketball team, in its 56th year of operation, is part of Madison Square Garden, L.P.. Cablevision Systems Corporation owns a controlling interest in MSG L.P., which also include the New York Rangers (NHL), the New York Liberty (WNBA), the Hartford Wolf Pack (American Hockey League), the MSG Network, Fox Sports Net and the Madison Square Garden arena complex, located in the heart of the New York metropolitan area.

###

NBA World Champions: 1970, 1973 • Eastern Conference Champions: 1951, 1952, 1953, 1970, 1972, 1973, 1994, 1996 • Atlantic Division Champions: 1971, 1980, 1993, 1994

MADISON SQUARE GARDEN
The World's Most Famous Arena

MSG 02495

Exhibit 16

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ANUCHA BROWNE SANDERS,

Plaintiff,

-against-

MADISON SQUARE GARDEN, L.P.,
ISIAH LORD THOMAS III AND JAMES L.
DOLAN,


Defendants.

Civil Case No. 06 Civ. 0589 (GEL)

ECF CASE

**DECLARATION OF
JONATHAN SCHINDEL, ESQ.**

JONATHAN SCHINDEL, ESQ., pursuant to 28 U.S.C. § 1746, declares:

1. I have personal knowledge of the facts set forth in this Declaration.
 2. I am a season ticket holder of the New York Knicks and make this Declaration in order to state what I observed and heard during an open practice held by the Knicks on October 30, 2005.
 3. I attended the open practice with my wife and two children. A friend of mine, with whom I share season tickets, Robert Levy, also attended the practice.
 4. At the practice, Knicks coach Larry Brown had the team do some drills and scrimmage with each other. The event lasted about an hour and a half.
 5. During the event, I sat with my family next to the area where players enter the arena.
 6. While seated, I saw Isiah Thomas standing about a foot from my seat along with two other people. One of those people was a short, overweight, older gray-haired gentleman. I am not sure who he was although he did look familiar to me. The other person was a woman who I later learned from press reports was Anucha Browne Sanders.
- 

7. I observed that the three of them stood very close together talking and watching the practice. To the best of my recollection, they were together for approximately half the practice.

8. On several occasions during the practice, someone new would approach Thomas and speak with him. Sometimes he would introduce the person to Ms. Browne Sanders.

9. During the introductions of Ms. Browne Sanders, he occasionally would place his hand on her arm and comment on her in various ways including comments like "She's so attractive," "She's so beautiful," "I can't concentrate on my work when she's around," and "She's easy on the eyes."

10. As Thomas made these introductions, he appeared to be playing the role of the host of the event and Ms. Browne Sanders did not appear to object. She was smiling during the introductions. She stood by his side and she did not appear to me to be offended or upset. I did not notice her moving away from him or trying to otherwise physically separate herself from him.

11. Months later, when I read about the lawsuit in the newspaper, I recognized Ms. Browne Sanders from her picture in the paper as the woman that I had seen with Thomas during the open practice.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 23, 2007.


Jonathan Schindel


Witness

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